



EQUALITY IMPACT ASSESSMENT (EIA) PRO-FORMA

This pro-forma is to be used to determine whether an Equality Impact Assessment (EIA) is required for a proposed policy, strategy or significant decision relating to service provision; and for recording details and outcomes of an impact assessment.

Title of policy / strategy, or brief description of the decision relating to service provision	Safeguarding Adults Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Shalene Brooker – Support Services Manager
EIA Team Members	Shalene Brooker, Valerie Feakins, Collette Rashbrook, Carole Adams
Director and Head of Service	Mary Gibbons, Director – Housing Essex
Does the EIA relates to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Swan Housing
Date that the Policy / strategy is due for review (if applicable)	November 2011

This pro-forma should be used to:

- Determine and record whether an Equality Impact Assessment (EIA) is required
- Determine and record the focus of an EIA if one is required
- Record the evidence considered
- Record the outcome of the impact assessment
- Record mitigating actions to be taken and measurable targets to assess progress.

Equality Impact Assessments are required to be undertaken on all proposed policies, strategies and significant decisions that could potentially have an adverse or disproportionate impact on any of the diverse communities for which Swan provides services. An EIA should address potential impact in respect of ethnicity / race, gender, transgender, disability, age, sexual orientation and religion or belief where relevant. This pro-forma also asks you to consider socio-economic status and community cohesion and have due regard for the protected characteristics introduced by the new Equality Act.

It is essential that officers refer to the **Equality Impact Assessment Guidance** when completing this pro-forma. The pro-forma is in two parts.

Part A: This part helps you determine and record whether an EIA is necessary and is essential documentary evidence to show that the Swan considers equality in respect of all significant policy and function decisions it makes. Part A must be completed in respect of all proposed policies, strategies or significant decisions that have an impact on service functions. Part A also helps you determine and record the focus of the EIA, if one is required. Part A covers steps 1 and 2.

Part A should be completed by a manager, with support from staff in the relevant service area (forming an EIA Team). Part A must be authorised by the manager responsible for the policy, strategy, or function before proceeding to Part B of the Impact Assessment. Housing managers should also ensure that drafts of both Part A and Part B are sent to the Housing Diversity Manager for comments before they are finalised.

Part B: Proceed to Part B if it is determined in Part A that a full EIA is required and once the focus of the EIA has been determined and agreed. This part of the pro-forma covers steps 3 to 6 as described in the Guidance. Please remember that the completion of an EIA and the actions identified within it are the responsibility of the relevant service manager.

Equality Impact Assessment Part A:

Reason and context for the new policy, strategy, proposal or decision

Please set out the aims and objectives of and contextual reasons for the proposed policy, strategy or decision. Contextual reasons may include changes in legislation, demographic changes or budgetary considerations. Alternatively, if this information is provided in another document, please append to this form.

All organisations have a duty to care safely for vulnerable adults for whom they provide activities or services. To demonstrate the Association has taken all possible steps to safeguard and promote their welfare, a Safeguarding Adults Policy needs to be implemented. The Safeguarding Adults Policy also ensures that the Association complies with all relevant legislation.

To protect vulnerable adults from abuse and to report any knowledge or suspicions of abuse – Swan will take action to ensure that this is reported to the appropriate authority for investigation.

The Safeguarding Adults Policy has been updated to take into account the Care Standards Act 2000, Safeguarding Vulnerable Groups Act 2006, Department of Health 'No Secrets' guidance and the Mental Capacity Act 2005.

STEP ONE: Relevance - Is there potential for the policy, strategy or decision to have an impact on equality?

<p>An EIA should be undertaken if the policy, strategy or decision is <i>relevant</i> to the promotion of equality i.e. there is potential for it to have an impact in respect of the equality strands and protected characteristics listed. Please use the box below to identify how your policy or strategy might be relevant to these strands. Please note you are not asked at this stage to determine whether there will or will not be a negative or disproportionate impact – simply whether there is potential.</p>	
Ethnicity / Race	All Safeguarding policies have some relevance across the equality strands / protected characteristics. Therefore a full EIA will be undertaken.
Disability	As above.
Gender (including pregnancy and maternity)	As above.
Transgender (including gender reassignment)	As above.
Age	The Safeguarding Adults Policy is applied to people over the age of 18, therefore issues related to children and young people are not covered by the Safeguarding Children Policy. Issues relating to adults, particularly older people who may be more vulnerable are relevant.
Sexual Orientation	As per the statement provided for the strands of ethnicity, disability and gender.
Religion/Belief	As per the statement provided for the strands of ethnicity, disability and gender.

Marriage and Civil Partnership	As per the statement provided for the strands of ethnicity, disability and gender.
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If you think that your policy / strategy or significant decision has relevance to socio-economic status or community cohesion then please use the box below to describe how it might be relevant. Please note that you are not asked at this stage to determine whether there will or will not be a negative or disproportionate impact – simply whether there is potential.	
Socio-economic Status	There is relevance to socio-economic status in relation to cases of financial abuse.
Community Cohesion	There is very little relevance to wider community cohesion.

STEP TWO: Determine the Focus of the EIA

Please list below what you will look at when undertaking your EIA i.e. what will be the focus. In most cases the focus will be whether the policy or decision will ensure equality of access to its benefits or outcomes; whether there are likely to be barriers for particular communities or if there are likely to be negative or disproportionate impacts for particular communities.
<p>Key focus of EIA:</p> <p>The Policy states the Associations commitment to achieving the protection of all vulnerable adults regardless of disability, gender, ethnicity, religion and sexual orientation. However, the full EIA will address the following issues / questions:</p> <ul style="list-style-type: none"> • Do all Swan staff responsible for implementing the Policy have an adequate understanding of equality issues to ensure that potential issues are considered on a case basis?

- Where risk factors are also linked to hate crime is there sufficient support or signposting available?
- Are the Policy and related procedures implemented in a way that maintains effective links to the Safeguarding Children Policy and other procedures related to domestic violence and hate crime? A joined up approach can help to ensure that any potentially negative equality impacts are mitigated.

Other potential equality issues may be identified and addressed throughout the development of the full EIA.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	<p>As per the overall focus detailed above.</p> <p>Is there an adequate system in place to ensure that key documents / information related to safeguarding can be produced in key languages and accessible formats on request?</p>
Gender (including Pregnancy and Maternity)	<p>As per the overall focus detailed above.</p>
Transgender (including Gender Reassignment)	<p>As per the overall focus detailed above.</p>
Disability	<p>As per the overall focus detailed above.</p>
Age	<p>As per the overall focus detailed above.</p>

Sexual Orientation	As per the overall focus detailed above.
Religion/ Belief	As per the overall focus detailed above.
Marriage and Civil Partnership	As per the overall focus detailed above.

Key focus of EIA in relation to socio-economic status and / or community cohesion (if appropriate):

Socio-economic status – Does the policy and any procedures related to its implementation sufficiently address issues relating to financial abuse?

Record whether or not an EIA is required:

Is an EIA required? <i>Please tick either yes or no</i>	Yes ✓	No
If yes, add target date for completion: 30 th November 2010	Signature of Manager	
	Print Name: Shalene Brooker	
	Date: 1st November 2010	

Please note that:

- 1) **Housing Managers** should send their completed PART A to the Housing Diversity Manager for comments before it is finalised.
- 2) A copy should be passed to the Diversity Action Forum (DAF) once completed.
- 3) Managers should keep a signed copy for their records.
- 4) All other Swan managers should send a copy of the PART A pro-forma to Central Services for the corporate EIA Log (this will be done for Housing Managers by the Housing Diversity Manager once EIA's are agreed).

Equality Impact Assessment Part B:

This part should be completed if it has been determined that an Equality Impact Assessment is required i.e. that the policy, strategy or significant decision has equality relevance and a service manager has agreed the focus of the assessment as set out in PART A.

STEP THREE: Look at the Evidence

Data sources

Having determined the types of questions or area of focus you want to address in the EIA, consider what data or information sources you may need to look at. For example, you may need to look at data/information that gives you an understanding of diversity in the areas in which Swan and / or your service operates; the needs of different sections in the community in respect of the policy area under review; national or local trends.

Record the data sources considered below in respect of each question / area of focus to be addressed in the EIA, providing a brief summary of what this told you and whether there were gaps in information e.g. if there is no or only limited data available.

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>An awareness of safeguarding issues amongst all employees of the organisation and knowledge of how to report any concerns pertaining to safeguarding adults.</p> <p>Where risk factors are also linked to hate crime, is sufficient support or signposting available?</p>	<p>Examination of current and planned policies and procedures.</p>	<p>Both Safeguarding Adult and Children Champions will ensure support and signposting will be provided if there are links to hate crime and / or domestic violence.</p> <p>All reported cases will be logged and forwarded to the appropriate Safeguarding Board and to Supporting People. A review will be undertaken on a quarterly basis in</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Are the Policy and related procedures implemented in a way that maintains effective links to the Safeguarding Children Policy and other procedures related to domestic violence and hate crime?</p>		<p>line with the Quality Assessment Framework to identify any trends and where our services can be improved to further support cases.</p>	
<p>Are key documents available in community languages and accessible formats on request?</p>	<p>Examination of current and planned policies and procedures.</p>	<p>All key documents can be produced in accessible formats, including large print, Makaton, Braille and community languages.</p> <p>One member of staff is able to sign, using British Sign Language.</p> <p>We are able to use textphone, text messaging and have a Hearing Loop in place in designated office areas.</p> <p>All staff have access to telephone interpreting via Language Line. Face to face interpreting can also be arranged for meetings with advance notice. Face to face interpretation may be appropriate for meetings of a</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		sensitive nature and where support is being provided to individuals.	
Do all Swan staff responsible for implementing the Policy have an adequate understanding of equality issues across equality strands to ensure that potential equality issues are considered on a case basis?	Examination of current and planned policies and procedures.	<p>Equality and diversity training has been delivered to a broad range of Swan staff within housing and supported housing teams. The teams also have representatives on the Diversity Action Forums (DAF's) that directly contribute to project work and the sharing of good practice.</p> <p>Some need has been identified to increase awareness of equality and diversity issues further, particularly in terms of practical considerations across daily housing and supported housing functions. Action to address this has already been built into the Essex and London Housing Diversity Action Plans (DAP's). Targeted sessions on priority equality and diversity areas will be delivered in 2011.</p>	
Do the policy and any procedures related to its implementation sufficiently	Examination of current and planned policies and procedures.	Financial Abuse is explicitly identified within the Policy as a form of abuse and a safeguarding issue. The Roles	

Question/focus to be addressed	Data/information source	Summary	Gap in data
address issues relating to financial abuse?		and responsibilities of Adult Protection Champion and staff and managers cover dealing with this form of abuse.	

Consultation

Most proposed policies, decisions or changes to existing policies will require consultation in order to understand the views of those likely to be affected. This consultation should take place when proposals are at a formative stage to enable staff to have an understanding of differences in views of diverse communities.

Please record below the consultation that was undertaken or considered as part of the assessment and a brief summary of findings.

Question / focus to be addressed	Description of consultation considered <i>Please include details of who was consulted, numbers taking part, methodology</i>	Key findings <i>Please include differences in views/needs as expressed by different sections of the community</i>
Overall consultation on the Safeguarding Adults Policy	<ul style="list-style-type: none"> • Resident Consultative Committees (RCC's) • Supported Housing Committee • Staff consultation • Supporting People Team 	No equality and diversity issues were raised during the consultation process; however a change to the Safeguarding leaflet was suggested to incorporate the Essex Safeguarding Board.

STEP FOUR: Assess Impact

Having considered the information collected and the findings of the consultation, make an assessment of whether there may be a positive, adverse or disproportionate impact in respect of the questions or areas of focus for the EIA. If there is likely to be an adverse or disproportionate impact upon a particular community, make a judgement as to whether this is justifiable (a proportionate means of achieving a legitimate aim). Please record your conclusions below.

Question / focus to be addressed	Is there likely to be a positive, negative or disproportionate impact?	Is this impact justifiable?
Overall assessment of impacts.	Swan does not consider there to be any significant equality impacts that are negative. This policy is in place to protect vulnerable people. Having a robust safeguarding policy in place is likely to have a positive impact.	
Do all Swan staff responsible for implementing the Policy have an adequate understanding of equality issues across equality strands to ensure that potential equality issues are considered on a case basis?	There is some need to further increase understanding of equality issues across service areas.	No. However further work is already detailed in the housing Diversity Action Plans and in the separate Safeguarding Adults EIA. Sessions addressing priority areas will take place in 2011.
Are the Policy and related procedures implemented in a way that maintains effective links to the Safeguarding Children Policy and other procedures related to	There is some need to further increase the understanding of safeguarding issues, policy and procedure. This includes the links to domestic violence and hate crime.	This has been addressed in the EIA Action Plan.

Question / focus to be addressed	Is there likely to be a positive, negative or disproportionate impact?	Is this impact justifiable?
<p>domestic violence and hate crime? A joined up approach can help to ensure that any potentially negative equality impacts are mitigated.</p> <p>Where risk factors are also linked to hate crime, is sufficient support or signposting available?</p>		
<p>Do the policy and any procedures related to its implementation sufficiently address issues relating to financial abuse?</p>	<p>The Policy and related procedures identify financial abuse and recognise it as a safeguarding issue. Having the Policy in place is likely to have a positive impact in this respect.</p>	

STEP FIVE: Action to Mitigate Adverse Impact

Where there is likely to be an unjustifiable negative or disproportionate impact, consider what mitigating action might be taken and if an improvement performance target needs to be set. Complete the box below.

STEP SIX: Plan and Set targets

The actions and targets should be incorporated into any relevant strategic documents and work plans. The lead EIA officer is responsible for overseeing this.

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
Building further awareness about safeguarding issues, policy, procedure and related equality and diversity issues.	Continue to work on awareness programme on safeguarding adults, which clearly demonstrates the responsibilities of everyone working for Swan HA – Safeguarding Champions to attend departmental team meetings. This will include relevant equality and diversity considerations and links to domestic violence and hate crime.	Awareness programme developed and implemented by the target date.	Shalene Brooker	Programme already in place, but work to continue until October 2011.
Maintaining insight of potential equality and diversity issues and acting to make improvements where appropriate.	Review all cases on a quarterly basis. The review process will also consider equality and diversity issues.	Review quarterly in line with Supporting People requirements.	Shalene Brooker	Ongoing until at least Nov 2012 (date of Policy review)

STEP SEVEN: Reporting and Logging the EIA

- 1) **Housing Managers** should send a copy of the EIA pro-forma to the Housing Diversity Manager for comments before it is finalised.
- 2) The EIA must be approved by the relevant service manager.
- 3) Managers may also wish to consider writing a covering report or paper for EIA's of a very strategic nature (this is optional).
- 4) Managers should keep a signed copy of the completed EIA pro-forma for their records.
- 5) The completed EIA should be reported to the relevant Diversity Action Forum (DAF).
- 6) All non housing managers should send an electronic copy of the finalised EIA to Central Services for the corporate log (the Housing Diversity Manager will do this for housing managers once the EIA has been agreed).
- 7) Key EIA's should be published on the Swan websites (the Housing Diversity Manager will arrange this for housing managers once the EIA has been agreed).

Signed.....

Print Name Shalene Brooker

Job Title Support Services Manager

Date 1st November 2010

Date sent to Housing Diversity Manager (if applicable) - Final draft sent to Housing Diversity Manager 1st November 2010

Date sent to DAF Scheduled for November and December 2010 meetings

Date sent to Central Services for Corporate Log